

Rev. 3/19

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Echota Wolfclaw #2023094005  
Class Members (see Page 9 of this official Document)  
Plaintiff's full name and prisoner number

Plaintiff,

v. Washington State "DSHS"  
Pierce County Council  
Ed Troyer (Sheriff)  
Bomkamp (Under-Sheriff)  
Patti Jackson (Chief of Correction)  
Defendant's/defendants' full name(s)  
See Attached

Defendant(s).

(If you cannot fit all of the defendants' names in the space provided, please write "see attached" in the space above and attach additional sheets of paper, as necessary, with the full list of names. The names listed here must be identical to those in Section II. Do not include addresses here. **Individuals whose names are not included in this section will not be considered defendants in this action.**)

Case No. 3:23-cv-05399 RAJ-GJL  
(leave blank – for court staff only)

PRISONER CIVIL RIGHTS  
COMPLAINT

Civil Commit (RCW 10.77)

Jury Demand?

☒ Yes☐ No

By my Definition I Refer  
to the title "Mentally Ill" as  
"Beautiful" or "Brilliant Minds"  
It is a derogatory term used  
to lesson a person,

WARNINGS

1. Do not use this form if you are challenging the validity of your criminal conviction or your criminal sentence. If you are challenging your conviction or sentence, or if you are seeking restoration of good-time credits that would shorten your sentence, you must file a Petition for Writ of Habeas Corpus. If you use this form to challenge your conviction or sentence, you risk having your claim dismissed. Separate forms are available for filing a habeas petition.

2. Under the Prison Litigation Reform Act ("PLRA"), you are required to exhaust all remedies in your institution's grievance system that are available to you before filing suit. This generally means that you must file a grievance and, if it is denied, appeal it through all available levels of review. Your case may be dismissed if you fail to exhaust administrative remedies, unless the administrative grievance process was not "available" to you within the meaning of the PLRA. You are not required to plead or show that you have exhausted your claim in this complaint.

3. Please review your complaint carefully before filing. If your case is dismissed, it may affect your ability to file future civil actions while incarcerated without prepaying the full filing fee. Under the PLRA, a prisoner who has had three or more civil actions or appeals dismissed as frivolous, malicious, or for failure to state a claim cannot file a new action without first paying the full filing fee, unless the prisoner is in imminent danger of serious bodily injury.

4. Under Federal Rule of Civil Procedure 5.2, papers filed with the court, including exhibits or attachments to a complaint, may not contain certain information, which must be modified as follows:

Do not include:

- a full social security number
- a full birth date
- the full name of a minor
- a complete financial account number

Instead, use:

- the last four digits
- the birth year
- the minor's initials
- the last four digits

5. You may, but do not need to, send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint. Any documents you submit *must relate directly to the claims you raise in this lawsuit*. They will become part of the court record and *will not be returned to you*.

## I. PLAINTIFF INFORMATION

Wolfclaw Echota C.	Justin Davey	
Name (Last, First, MI)	Aliases/Formal Names	
2023094005		
Prisoner ID #		
Pierce County Jail		
Place of Detention		
910 Tacoma Ave S		
Institutional Address		
Pierce, Tacoma	WA	98402
County, City	State	Zip Code

Indicate your status:

- |  |   |
|--|---|
| <input type="checkbox"/> Pretrial detainee                     | <input type="checkbox"/> Convicted and sentenced state prisoner   |
| <input checked="" type="checkbox"/> Civilly committed detainee | <input type="checkbox"/> Convicted and sentenced federal prisoner |
| <input type="checkbox"/> Immigration detainee                  |   |

**II. DEFENDANT INFORMATION**

Please list the following information for each defendant. If the correct information is not provided, it could delay or prevent service of the complaint. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page of the complaint. Attach additional sheets of paper as necessary.

Defendant 1: Washington State DSHS  
 Name (Last, First)  
Western State Hospital  
 Current Job Title  
Ofmhs courtorders@dshs.wa.gov  
 Current Work Address  
Pierce WA  
 County, City State Zip Code

*Address to serve Unknown*

Defendant 2: Pierce County Council  
 Name (Last, First)  
County official Policy makers  
 Current Job Title  
930 Tacoma Ave S Floor 6  
 Current Work Address  
Pierce Tacoma WA 98402  
 County, City State Zip Code

Defendant 3: Ed Troyer  
 Name (Last, First)  
Sheriff of Pierce County  
 Current Job Title  
930 Tacoma Ave S  
 Current Work Address  
Pierce Tacoma WA 98402  
 County, City State Zip Code

Defendant 4: "Bom Kamp" Under-sheriff  
 Defendant 5: Patti Jackson

## Defendants

1 Defendant "Pierce County" through its County Sheriff, under-Sheriff and Chief of Corrections, is being Sued in its official Capacity.

2. Pierce County Council  
County City Building, Floor 6  
930 Tacoma Ave S.  
Tacoma WA. 98402

2. "Ed Troyer" Sheriff of Pierce County

3. "Bom Kamp" Under-Sheriff of Pierce County  
Defendants "Ed Troyer" and "Bom Kamp" are and were "Sheriff" and "Under-Sheriff" of Pierce County, and in that Capacity are and Were Responsible for establishing or failing to establish the Policies, Practices, and Regulations for the Conduct of the Pierce County Sheriff Department and its employees.

Defendants "Ed Troyer" and "Bom Kamp" are and were Responsible for the hiring, training, supervision, discipline, and control of all Members of the Pierce County Sheriff Department. Defendants "County Sheriff" and "Under-Sheriff" have a Constitutional and Statutory responsibility for the Conditions and Practices of the Pierce County Jail facility and are Responsible for Maintaining the Jail facility in conformity with

Defendants P.1



### Constitutional Requisites.

Defendants are also Custodians of the Jail Facility, responsible for the neglect and omission of the Duties of all Deputy Sheriff's and Correction officers, and Charged with Furnishing necessary Sanitation, Bedding, Clothing, Medical Aid, and Mental Health Workers for all Person's detained in the Jail Facility.

In addition, Defendants "County Sheriff" and Under-Sheriff, are and were responsible for ensuring that the Deputy Sheriff and correction officers of Pierce County Sheriff Department Obey Regulations of the Pierce County Sheriff's Department, the Ordinance and Law of Pierce County, and the Laws and Constitution of the State of Washington and the United States.

Defendants, are and were responsible for the establishment, Policies, Procedures and guidelines for the arrest and Safe Keeping of Pre-Trial, and Civil Commit detainees.

"Ed Troyer" is Sued in his Individual & Official Capacity.

"Bomkamp" is Sued in his Individual & official Capacity.

4. Patti Jackson "Chief of the Internal operations of corrections."

Defendants Patti Jackson is and was the Chief

Defendants D.2

of the Internal Operation of the Sheriff Dept Correction Bureau, and in that Capacity, is and was Constitutionally and Statutorily Responsible also for the training, Supervision, Discipline, and Control of all Deputy Correction Officers, as well as the operation, Practices, and totality of Conditions of the Pierce County Jail Facility.

Defendant "Chief" has Statutory Responsibility also for ensuring that the Pierce County Jail Facility conforms to the Requirements of State Law, and the Laws and Constitution of the United States.

In addition, defendant Chief is and was Responsible for the establishment of Policies, Procedures, and Guidelines for the Arrest, Jailing, and Safe-keeping of Pre-Trial and Civil Commit detainees housed in the Pierce County Jail Facility.

Pattie Jackson is Sued in her Individual and Official Capacity

Ed Troyer, Bom Kamp, Patti Jackson  
Pierce County Sheriff Dept.

930 Tacoma Ave S,

Tacoma, WA. 98402

5. Kevin Wt Quigley "Secretary of D.S.H.S."  
Defendants P 2

6. Dorothy Sawyer "Chief Executive of D.S.H.S." Defendant "Washington State" through its Department of Social and Health Services is charged under Washington Law with overseeing Competency Services, including evaluations and Restorations. RCW 10.77 et Seq. IF an individual is found to be incompetent to stand trial, State Law Places "those incompetent" under the Custody, Responsibility, and Care of Washington State D.S.H.S., and who shall, "Provide Mental Health Treatment and Restoration of Competency." RCW 10.77.088; See also 10.77.084 and 10.77.086.

When a Court has ordered an individual to undergo Competency Evaluation or Restoration, the individual's Criminal Case is Stayed during all Competency-Related Proceedings. See RCW 10.77.084 (Providing that after a Criminal defendant has been found incompetent, the Proceedings against the defendant are stayed). Washington State Court Rules: Superior Court Criminal Rules. CrR 3.3(e)(1), CrRLJ 3.3, and JuCR 7.8.

Because an individual's Criminal Proceedings are "Stopped", the individual is no longer a "Prisoner", but a "Patient" under the Custody, Care and Responsibility of Washington State DSHS.

Attorney for Washington State ✓  
 (Anthony Vaupel) Washington State Attorney General  
 (Mark Pavela) Attorney General Office.



## Additional Defendants

1. John Doe Captain Deputy Correction Officer is sued individually and Official Capacity. (4-26-2023 Formal inspection)
2. John Doe Lieutenant Deputy Correction Officer is sued individually and official Capacity. (4-26-2023 Formal inspection)
3. "Mastandrea" Sgt. Deputy Correction officer is Sued individually and official Capacity. (See Davey v. Pierce County Council et al Plus 4-26-2023)
4. John Doe "Pierce County Jails Maintenance" is Sued in official Capacity (4-26-2023) See Engineering Report 2014...
5. Naphe Care & "John Doe Medical Staff" is sued in their individual and official Capacity.
6. Pierce County Jail Mental Health Karen Bier, R. Muuru and "John Doe" in their Individual and official Capacity.
7. Pierce County Deputy Correction Officers, "Desmond", "Severson", "Marena", "Warren", "Abel", "Maulin", "White", "Sawyer", "Earp", "Mr. Rankin", "Ramos", "Stephen" and all "John Doe" Deputy Correction officers who have worked in 3 north unit Collectively and "Personally" knowingly failed to Protect Myself and Class Members from foreseeable Harm, a duty in which "We" are allowed, causing injury.



All individually named Deputy Correction Officers have personally worked in 3North unit, and all named Deputy Officers, we have personally spoken about the dangers of being exposed to Raw Sewage, about how we are all getting Sick, being exposed to foul odors all day, with a Response of, "What do you want us to do about it", "we are not Maintenance", "Pierce County is aware", "We also have to Suffer"!!!!???

I ask the Court if it's Possible, to allow and Join all Deputy Correction Officers, who have been forced to work in 3North unit, and Exposed to Hazardous Working Conditions, who for 8 to 16 hours shift hours a day, were also exposed to Nauseous, Assaultive Sewage gas, inhaling those gases which could cause Respiratory Damage, headaches, etc. These officers are forced to work in an environment that is Toxic, even having to at times act as <sup>to</sup> "Maintenance" which is not covered in their Job Title, by flushing nasty "Shitty toilets" and Dumping water down Sewage Pipes so that it Eliminates their work and our living Conditions at the hands of their employers, Pierce County Council, Ed Troyer, Bomkamp & Patti Jackson who have not shut down this unit, who have known of these dangers but have failed to execute their duties.

Is it Possible to Join these Deputies as "Class Members"  
Thank You Respectfully, because we are all human beings.

Signed Echota Wolf Class  
Waffelon E

### III. STATEMENT OF CLAIM(S)

*In this section, you must explain what you believe each defendant did to violate your civil rights, and if you know, identify the federal statutory or constitutional right you believe was violated.*

*If you believe the defendant(s) violated your civil rights in more than one way, explain each violation under a different count. For example, if you believe you received constitutionally inadequate medical care and your religious rights were substantially burdened, include one claim under "Count I" (i.e., medical) and the other claim under "Count II" (i.e., religion).*

*Number your paragraphs. For example, in Count I, paragraphs should be numbered 1.1, 1.2, 1.3, etc., and in Count II, paragraphs should be numbered 2.1, 2.2, 2.3, etc. The first two paragraphs of each Count have been numbered for you.*

*If you have more than three counts, attach additional pages and follow the same format for each count.*

*If you attach documents to support the facts of your claim(s), you must specify which portion of the document(s) (i.e., page and paragraph) you are relying on to support the specific fact(s) of your claim(s). If you do not specify the portion of the supporting document(s), the Court may disregard your document(s).*

#### COUNT I

*Identify the first right you believe was violated and by whom:*

1.1 8<sup>th</sup> Amendment brought by the 14<sup>th</sup> Amendment  
Washington State Due Process clause

*State the facts of your first claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.*

1.2 See Attached  
Also See Document on class certification

## Plaintiff Individual Claims

1.1 Plaintiff, Mr. Wolfclan, a civil detainee at the Pierce County Jail, brings this Section 1983 Complaint against Defendants, who acting under Color of Law, Deprived him of:

1. 1<sup>st</sup> Amendment (Religious Freedom)

2. 1<sup>st</sup> Amendment (Right to Petition Government by Grievances)

3. 8<sup>th</sup> Amendment brought forth by the 14<sup>th</sup> Amendment "Due Process"

4. Washington State Due Process Clause

5. Ministerial Negligence / Governmental misconduct

1.2 On 4-5-2023, Mr. Wolfclan was arraigned and found incompetent to Proceed by the Pierce County Superior Court and an order for an evaluation was signed according to RCW 10.77

1.3 On 4-6-2023, Mr. Wolfclan was arraigned in Pierce County District Court where the Court ordered yet another evaluation for competency according to RCW 10.77.

1.4 On 4-8-2023, Mr. Wolfclan was Placed in "Beautiful Minds" Housing Unit 3N/A Cell 6-7, due to being victimized in General Population.

1.5 Upon entering the unit, Mr. Wolfclan immediately, to his dismay, was exposed to the Most Noxious, assaultive Gassy odor that shocks the Conscious and gave him "Immediate headache and Anxiety

1.6 Plaintiff was Placed in 3North A Cell 6-7



where he would share a Cell with another resident detainee.

1.7 As Mr. Wolfclan entered the Cell, his Cell-mate was sleeping but Plaintiff noticed that the toilet was full of back-flushed Raw-Sewage, and the cell wreaked of noxious fumes.

1.8 Mr. Wolfclan immediately asked for Cleaning Spray, but was denied, a Practice and Custom the Jail maintains seeing that there is no "Set Policy for cleaning supplies."

1.9 Mr. Wolfclan then asked for a grievance but was told by Cluster Officers that they no longer hand out Grievances, another Practice and Custom Pierce County Officials are known for.

1.10 Mr. Wolfclan's Cell-Mate, John \_\_\_\_\_, had been sick, diarrhea, headaches, vomiting and was not eating his food, lasting up to 3-4 days.

1.11 On 4-9-2023, Mr. Wolfclan tried to Electronically Kite for Grievance, but the Kiosk was frozen, a Practice that now happens all the time, the excuse being, "oh its just updating". Lol, updating everytime someone wants a grievance, how sick!

1.12 Mr. Wolfclan wanted to let the Government of Pierce County through Grievance Know, that he "once again" wake up with human bodily waste, back-flushed and splashed onto his toilet, and forced to eat breakfast next to a toilet that

had just collected Sewage waste all night long, the Cell smelling like noxious, gasey odors and being denied Cleaning Supplies.

1.13 You see, 3 years ago, Mr. Wolfclan A.K.A. Justin Davey, was forced to live in these Squalid living Conditions for approximately 7 Month's. He Complained nearly every 3 weeks on "Formal Inspection" days, was denied Cleaning Supplies but 2 times during those 7 Month's and was denied grievance because Pierce County was aware of the issue, it was a 30 year Mistake. Plaintiff eventually obtained a Grievance, but it was somehow lost on Appeal. He Complained to Mental Health, Medical and Captains, even getting a response from Captain Genga that a Work Order was Put in to Fix Problem.

1.14 On 1-25-21, a 1983 Complaint was Filed on behalf of the Conditions that Mr. Wolfclan (at that time Justin Davey) was being held under. See The Honorable Magistrates S. Kate Vaughan's opinion at Davey v. Pierce Cnty. Council, 2022 U.S. Dist Lexis 125871...

1.15 Today is approximately 5-1-2023, and nothing has been done to Cure, abate or fix the Conditions of the "Beautiful Minds" housing unit in Pierce County Jail 3North A (3NA)

1.16 It is Criminal for Defendants to knowingly force the "Beautiful Minds" to live in Squalid, toxic Conditions and do nothing about it. And Mr.



Wolfclan Request a full inspection by the Department of Justice on all individual Defendants.

1.17 On 4-10-2023, D.S.H.S forensic Psychologist found Mr. Wolfclan incompetent to Proceed, according to RCW 10.77.

1.18 Since returning to this unit, approximately 2 years from serving the County, Ed Trayer and Patti Jackson with 1983 Complaint (#3:21-cv-05068-Jcc-SKV) on 4-8-2023, numerous residence of BVA have been getting sick, including one Residence (Mr. Chris Donapoli) who had to be moved out due to his eyes swelling shut. Another Resident, (Tray Sevasin) who was put on IV when he first got here, due to him feeling Nauseous all the time and not being able to eat. (Also one now with MRSA / swollen leg)

1.19 Since being in this unit 2 years ago, the conditions have become worse, the gasey sewage odor is about 7x more noxious than before, to the point that they are now handing out Candy Bars to our unit workers so they can pour soapy water down the 10-11 sewage drainage pipes, get this, without proper P.P.E.

1.20 On 4-16-2023, Resident 21-22 started throwing up out of no-where, he felt sick and had headaches, that same night Deputy C.O Maulin at around 6:50 PM, while doing unit walk, Yeld,



"Fuck it Smells like Shit in here", and "They need to fix this Shit."

1.20 On 4-18-2023, Deputy C-O Severson had unit workers dump water down the Sewage Pipes, again this Practice does not work.

1.21 On 4-19-2023, Deputy C-O Mrs. Earp, because the Smell was so bad, at 9AM, around the time Mr. Wolfelan Prays according to his Religious beliefs, Sprayed Air Freshener in his Cell and the rest of Unit. Though Mr. Wolfelan thanked C-O Earp, and appreciated the thoughtful gesture, it still did not cure, abate, and fix the Condition.

1.22 On 4-20-2023, Deputy C-O White, unlocked an empty Cell, and personally flushed a toilet that had back-flushed human waste in it that had Piled up in it for nearly 12 days that Plaintiff Wolfelan knew of, just to Put a Mentally Ill Residence in it without having it Cleaned.

1.23 On 4-20-2023, Deputy C-O White had unit workers Dump water down Sewage Pipes again because of the noxious Gasey Smelly odor. That Night, Deputy C-O Ramos also had unit workers dump water down the Units Sewage Pipes, again a Practice that doesn't work, also indicating that the Condition is becoming worse with how frequent they are having

unit workers dump water down the drains.

1.24 Since Returning to this Unit 4-8-2023, Mr. Wolfclan has been Put on Medication <sup>for</sup> headaches, allergies (I've never had allergies) upset Stomach, Coughing up Mucus and Respiratory Problems.

1.25 Since Returning to this Unit 4-8-2023, Mr. Wolfclan has had someone else's Bodily Waste/Raw Sewage back-Flush and Splash up onto his anus, and Genitals 4 times now while going #2.

1.26 Everytime the adjoining cell Flushes their ~~toilet~~ <sup>Raw-Sewage</sup> will back-Flush into his toilet, either Splashing Sewage water on his toilet, wall and floor or if the adjoining cell continues to flush, his toilet at times overflows... This is the Same for each Cell. If Someone is going #2, we are exposed at times to the adjoining cell flushing their toilet, and it back-flushing into our toilets and Splashing onto our Privates

1.27 Plaintiff Pleads with the Court, our unit is a Breeding Ground for disease and we as a unit are at a Substantial Risk at not only getting a disease but Fear of Spreading a disease.

1.28 On 4-21-2023, <sup>Plaintiff</sup> while Showering after applying Soap to his "Penis", he felt a stinging sensation and noticed an open Sore.

1.29 On 4-22-2023, Plaintiff sent a Concern to Medical



about the Situation... Awaiting Blood Test...

- 1.30 I, Mr. Wolfclan am at a total Shock, to the utter disregard to the Health, Safety and well being of the States and Pierce counties Most "Beautiful Minds", the Mentally ill, by Continuing to allow us to be Subjected to Toxic, dangerous inhumane Conditions.
- 1.31 The Unit Shower appears to have Black Mold falling out of vent, getting onto My Skin while un-dressing and Dressing, the Wall also has Rusted looking Paint, which falls on us.
- 1.32 Our units Floor, is covered in Black grime, including our Cell Floors, when one walks on it, within an hour the grime transfers onto our Socks, leaving the bottom of our Socks black. We then spread that grime onto our blankets and beds.
- 1.33 Also to note, Many of us "Cope" and Rid our anxiety by Pacing back and Forth, including Myself.
- 1.34 When our toilets back-Flush, Splashing Raw Sewage on our Floors, we are forced to walk on unsanitary floors, transferring that Sewage to our Socks, beds, our blankets. when we lay down

Deliberate indifference

- 1.35 Defendants Pierce County Council, "Ed Troyer", "Bomkamp", and "Chief Patti Jackson" were and still are Deliberately Indifferent to Plaintiffs



and all Residents of 3rd A Constitutional Rights, by Subjecting Plaintiff and Residence to Dangerous, toxic and inhumane Conditions of Confinement.

1.36 Defendants Pierce County, Ed Troyer, "Bomkamp" and Patti Jackson knew of the inhumane conditions of 3rd North A Mental Health unit and failed to cure, abate or fix the condition, leaving us in a state of exacerbation of Mind, body & soul.

1.37 My Religious Freedoms are Violated when I have to Prostrate My Body on an unsanitary floor, Putting my forehead to the ground in Kissing Reverence to My Saviors feet. According to Revelations 14, it says the Chosen will have the Son & Father name written on their forehead, I Plaintiff have "Jesus Saves" Tattooed on My forehead.

1.38 On January 29th 2023, I Plaintiff was Baptized at Champion Center, showing my outward sign of an inner faith. This was right before the Draconian Pierce County Officials abducted me and forced me back in this Dungeon.

1.39 Why do I say this? Because it does show that I am a Religious Person and when one worships/Proskunias, it means to Prostrate & Kiss.

1.40 Either, I Plaintiff am forced to Worship/Prostrate and Kiss My Saviors feet on unsanitary floors or disobey My Creator, I must Obey and Worship as the afterlife is far greater than being

Disobedient because an Evil Draconian Government Force's you to either Worship & Kiss Creators Feet on unsanitary, Toxic Raw sewage infested Jail Cells, or Disobey Creator by not doing it because of the unsanitary Problem.

1.41 How Dehumanizing, Demoralizing can a Government get, by Trying to destroy ones Religious Freedoms (1<sup>st</sup> Amendment), by not allowing one to freely Petition the Government by Grievance (1<sup>st</sup> Amendment), by subjecting and Forcing its Most "Beautiful Minds" the Mentally Ill, to Cruel and Unusual Punishment including Psychological Torture (8<sup>th</sup> Amendment) when one should not be Punished at all (14<sup>th</sup> Amendment Due Process and Washington State Due Process) and a out-right Misconduct and negligence to continue to force its Most "Beautiful Minds" in Toxic living Conditions.

1.42 Defendants knowingly are Causing these Deprivations to Continue. How!

1.43 Defendants were Put on notice as far back as 2012, Twice... In January 2012, and February 2012, Two 1983 Complaints were filed and both Complained of Toilets back-Flushing & someone else bodily waste was Bubbling up in their toilet. See Steele V. Kerr 2012, u.s. Dist Lexis 28767 See also Meyer-Clemmons V. Kerr, 2012 u.s. Dist Lexis 28798 ...



1.44 In 2014, an Engineering Report was Conducted on the Jails/Facilities Sewage and Plumbing. The Report Spoke at great length on the Conditions of Pierce County Jails, Plumbing being in need of Great Repair to Satisfy Washington's updated "code" explaining that the toilets in the unit adjacent to each other are connected, and over the years have deteriorated to the point where when one flushes his toilet the flap stays open causing back-flushing to happen in the adjoining cell. WOW, this Report was Conducted in 2014.

1.45 However it gets better, in 2015-2016 Washington State, (through its department of Social and Health Services) Conducted an over-all investigation of its County Jail facilities, Pierce County Jail being one of those facilities. This investigation was based on the Landmark Case Trueblood v. Washington State D.S.H.S., because county Jails are not suitable places to house the Counties (Beautiful Minds) Mentally ill. The investigation Conducted can be found on Disability Rights Washington Website, in a book sitting each County. For Pierce County Jail, the Major Problem, The Cell Lights were Bright and the Facility was a bit Cold.

1.46 This Report and Investigation that was conducted by D.S.H.S. supports negligence on Washington State because it Contradicts the Engineering



Report conducted in 2014.

1.47 In 2020, I Mr. Wolfelan, Complained and Complained of the unconstitutional Conditions of our unit, I brought awareness to every Department that I could including; Medical Staff, MH Providers, Captains, Lieutenants, Sgt's and Deputy Correction officers.

1.48 I Mr. Wolfelan Filed an extensive Grievance on December 16<sup>th</sup> 2020, about the Conditions of our Confinement, Closing with asking that the Jail move our "Beautiful Minds" Mental Health unit to a Safer location.

1.49 With the Grievance un-answered, I filed a 1983 Complaint on January 25<sup>th</sup> 2021, and that Complaint was Served on Defendants Pierce County Council, Ed Troyer and Patti Jackson. It is an undisputed fact that Pierce County Council, Ed Troyer and Patti Jackson were put on notice not only by the 2014 Engineering Report, but Personally, through the Service of the United States District Court in 2021 with Cause # 3:21-cv-05068-Jec-SKV, that not only had my 1983 Complaint, but also in the complaint attached was My Grievance, over 10 declarations of Residence in 3VA, Plus My Citing the Two "2012" 1983 Complaints.

1.50 However, Pierce County et al, did make an exclusive offer of \$33,000 for all Claims that had happened between 5-12-2020 to 3-16-2021. See

Case #3:21-cv-05068-Jcc-Skv.

1.51 Your Honor, it was through Discovery Process in Cause #3:21-cv-05068-Jcc-Skv, that We, Stoel Rives LLP Attorney Scott Pritchard and I obtained the 2014 Engineering Report and other important documents including an Email, dated 1-28-2021, between Maintenance and a Deputy Sgt describing in detail that a Person (me) in 3NA is complaining about the toilets backflushing other people waste, and Maintenance Replying that, "a report was conducted a few years back (2014 Report), we cant do anything about it, Pierce County wont fund Project...

1.52 I, Mr. Wolfclan would like to Make it Clear that I Settled out of Court because "I Thought" through all its findings, The Declarations from other Residents in 3NA, My Grievance Dated 12-16-2020, My 1983 Complaint, that Patti Jackson, Ed Troyer, "Bomkamp" and or the Council of Pierce County, would have at least Moved the Mental Health Unit to a unit Constitutionally Compatable to live in if it didn't want to fund the Project...

1.53 However, to My Dismay, these Defendants have left this Unit of its Most "Brilliant Minds" the Mentally ill, to Suffer. This is not only Physical Torture, but Psychological induced torture,



1.54 One Residence, after Returning to the unit after two days, because his eyes were Swollen Shut, Said that the "Smell of Shit all day long is Making him want to Kill himself", he even told the guards on Friday the 21<sup>st</sup> that he didn't want to be in that cell 14-15 because it smelled so bad, and asked if they could move him to cell 4-5 which was empty. They said no. The next day Saturday April 22<sup>nd</sup>, he told the officers he didn't feel safe because the odor, and they took him to the hole. His name, "Chris Dinopoli".

1.55 Just imagine a Mass Suicide because of the De-humanizing Practice of Keeping (its Most Beautiful Minds) the Mentally ill in the Jails. Most unhygienic, Toxic, dangerous unit it has. Why?

1.56 I, Mr. Wolfclan Must Note, on 4-4-2023, I was brought to Pierce County Jail, I was Place in Unit 2-B. Unit 2-B smelled good, toilets flushed and didn't back-flush, the showers didn't have Rust or Mold, the Floors were not filled with Black, grime, and Ironically, the whole unit has brand-new Mattresses with Pillows built in.

1.57 On 4-5-2023, The Jail moves Me to 4 South B unit. The units Remarkably Clean, Toilets work, No BackFlushing, Showers are brand-new looking, No Black Grime on Floor, and Ironically every bed



Mattress was Brand-new with Pillows built in.

1.58 On 4-8-2023, Mental Health Moves Me From the General population because of being Victimized, and I get Put in 3NA unit M-H housing. The unit is a hell-hole.

1.59 Our Mattresses are not even a half inch thick, they are over 3 years of being used, they have holes in them (Tears/Rips), when one urinates, Throws-up, bleeds and or defecates on these Mattresses with holes, Rips and Tears in them, it cannot be Sanitized by Spray, for instance, that urine or throw-up seeps into the Rips and holes, Making the Mattress Contaminated, but we are forced to Sleep on these Nasty disease Breeding Mattresses.

1.60 Our toilets backflush, our unit Smells like toxic Gasey odors, our Shower is Rusty-moldy and our Floor is Grimy with Probably years and years of Overflowed Sewage that the Residence of 3NA have Tracked around.

1.61 Is this Discrimination? Does this Deprive us of the America Disability Act?

1.62 It is my Belief that the Defendants are Monsters, that they are Devils and Actors of Righteousness, while Torturing and Laughing at us everyday.

1.63 US ("Beautiful Minds") Mentally ill, are not just Mentally ill, We are Fathers, Brothers,

uncles, Grandpa's, Students, Patients, Some were Famous (Drummer Beach Boys) Some are Authors and Lawyers and Most of all, "We if you understood US, are Beautiful & Brilliant Minds".

1.64 We are not Monsters, We also have the Capacity to feel Emotions, We are beings with Souls; Souls that are at times, without understanding, the differences between Right and Wrong, We are knowingly being Deprived and Raped of our Constitutional Rights and tortured at the hand of this Government.

1.65 The United States District Court fights for "We the People of the United State" in its Constitution, and are the True Court of this Land.

1.66 Washington State and its Code is ever changing its Language, Forcing us to its Authoritarian Statutes as "We the Government" of Washington, Subjecting us to inhumane Conditions of Confinement, even after being Put on Notice. I am so afflicted in my Soul, I just want to Scream & Cuss. How can a people so free, subvert their people to this.

1.67 Yes, Defendants Maintained, and still Maintain a, Widespread Practice that, although not authorized by written Law or express Municipal Policy, is so Permanent and well-settled as to constitute



a custom or usage with the force of law, &  
1.68 Defendant Washington State D.S.H.S., for  
negligently failing to protect Mr. Wolfclan  
from foreseeable harm.

You see,

1.69 D.S.H.S. "Evaluators filed incompetency Petitions  
on behalf of Mr. Wolfclan, and the Pierce County  
Superior Court, Pierce County District Court, and  
Renton City Municipal Court Placed Mr. Wolfclan  
in the Custody and Control of D.S.H.S. while  
allowing Mr. Wolfclan to be Supervised by  
Pierce County Jails Policies, Practices and  
Customs while awaiting Transfer to hospital.

### / Injuries

Defendants have Caused Plaintiff Suffering through  
its Refusal to Cure, abate or Fix its Jail Facility.  
Plaintiff Continuously has headache, Dizziness  
Fatigue, cannot eat at times, throw-up / Dry-heave,  
Diarrhea, upset stomach, exacerbated mental illness,  
Psychological Torture, Physical Torture.

### Relief.

Punitive, Compensatory, Nominal Damages  
are being asked in the amount of  
\$5,000,000 (Five Million Dollars) and immediate  
injunctive Relief, Forcing Defendants to move  
our whole unit to safer, healthier unit in



Pierce County Jail until facility is Constitutionally  
Compatible.

I also ask for Attorney Fee's from Defendants  
and immediate Class Certification

Attached -  
See Class Certification

under Penalty of Perjury, I declare &  
believe the foregoing is True & Correct to  
the Best of my Ability.

Signed

Echota Wolfclan AKA Justin Davey  
Wolfclan &

5-1-2023

At Pierce County Jail 3 North A unit.

## Supplemental Complaint

1.1 On 4-26-2023, during "Formal Inspection", us, Class members (22 of us) specifically as a unit spoke of the Dangers of this unit, how we were all getting sick, some of us are getting infections, Many have reported the Conditions to Medical Staff, to Mental Health, Officers, John Doe "Captain", John Doe "Leutenant", Sgt "Mastandrea", Three official Maintenance Men were our "Formal Inspection" Participating officials. We asked for the Chief, Ed Troyer, and Ben Kamp, The Council, our Medical, Mental Health Personal to Move our Mental Health Unit.

John Doe Leutenant said, "I don't believe that will happen, but sometimes the only way to get things Moving Faster is to "Sue Them." Ummm Really.

Your Honor, We ask for immediate injunctive Power, Forcing Defendant's to Move our unit... If not, Collectively, our unit as a "Whole", will Refuse to not eat in unhygienic Toxic Condition, and we will do a "Sit Down", Stating, "We Can't Breathe" "We Can't Breathe", "We Can't Breathe" until defendant's move us. Our Families are

Suffering, worried we are going to Catch a disease that will slowly Cause us Suffering and Death.

Our Families are Contacting "the news" Stations, "News Papers," our "Criminal Lawyers" and we will have a Lawyer on the Phone while we all Participate in our "Sit down", so Defendants cannot say we were Rioting, and or Pepper Spray us. We have a Constitutional "Right of the People Peaceably to assemble, and to Petition the Government for a Redress of Grievances"

THANK You Respectfully

Petitioner  
Wolfgang E  
Echoa Wolfgang

5-1-2023

### Class Members

1 ELIJAH G KING (5/1/23 3 WAZH ELIJAH KING)	5-1-2023
2 TROY G SEVASH	5-1-2023
3 IAN FLANNERY	5-1-2023
4 DOUG DETWILER	5-1-2023
5 AUSTIN JELLYSON	5-1-2023
6 REBECCAH SWENSEN	5-1-2023
7 MARK ERISMAN	5-1-23
8 KRISTOPHER STARKGRAF	5/1/23
9 JUSTIN CUTLER	5/1/23



## Plaintiff and Class Certification

- 1.1 I, Echota WolfClan, (F.K.A. Justin Davey), brings forth this Civil Complaint, Pursuant to U.S.C 1983, for a deprivation of My/class members Constitutional Rights, under Color of Law.
- 1.2 I, Echota WolfClan, acting "Pro-se", ask this Court, according to Rule 23, for Class Certification in 3 Seperate but distinct Classes.

### 1. Damages Class:

All Person's who are or were detainees or Prisoners in the Custody of the Pierce County Sheriff's Department and housed in the Pierce County Correction Facility 3NA, located in Pierce County, City of Tacoma, State of Washington, on or after January 1st 2012.

### 2. Injunctive Class:

All Person's who, now or at anytime in the future, are or will be detainees or Prisoners in the Custody of the Pierce County Sheriff's, and housed in the Pierce County Correction Facility 3NA, Located in Pierce County, City of Tacoma, State of Washington

### 3. RCW 10.77 Class

All Person's who, according to RCW 10.77, who's Proceeding are or were stayed,

and at the time were found incompetent to Proceed, and whose Care and Custody had been transferred to Washington State Department of Social & Health Services, after 7 days of the Court order, remain or remained in Squalid, unhygienic, and Hazardous living Conditions in "3NA" that Pose a Substantial and ongoing risk to Mine, Echota Wolfclan and Class members Physical and Mental Health, at the Pierce County Correction Facility, 3NA unit

Reason for immediate Class Certification and  
injunctive Relief!

1.3 I Previously, under My Former name, Justin Davey, Filed a 1983 Complaint on or around January 25<sup>th</sup>, 2021, but was transferred to Prison March 16<sup>th</sup> 2021, Making my Request for injunctive Relief moot, however on March 10<sup>th</sup>, 2022 under Davey v. Pierce Cnty. Council, 2022 U.S. Dist Lexis 125871, the Honorable Magistrate Granted my Claims but to the individual capacity of Ed Trayer (Sheriff) and Patti Jackson (Chief of corrections) Denied it.

1.4 On or around August 8<sup>th</sup> 2022, The Honorable Magistrate Judge "S. Kate Vaughan" Made an order Reconsidering Request For APpt. of Counsel Plaintiff & class certification P.2

by Stating, "The Court hereby Sua Sponte reconsiders Plaintiffs Request for APPT. of Counsel and Concludes that extraordinary Circumstances now support the appt. of Counsel." (See Davey v. Pierce Cnty. Council, 2022 U.S. Dist. Lexis 140835)

1.5 Attorney Scott Pritchard of Stoel Rives LLP signed on to My Cause #C21-05068-Jcc-SKV Late October/early November 2022, and what was found during discovery was disturbing.

1.6 AS far back as 2012, Pierce County was Put on notice by two 1983 Complaints, describing cell's as being inhumane, toilets backflushing, although both Complaints were denied for failure to exhaust Remedies. <sup>Steele v. Kerr 2012, U.S. Dist. Lexis 28767</sup> Meyer-Clemmons v. Kerr 2012 U.S. Dist. Lexis 28799

1.7 IF that wasn't enough to Put Pierce County on notice, then the 2014 Engineering Report would have not only Put Pierce County on notice, but the Sheriff of Pierce County, the under-Sheriff and the Chief of Corrections.

1.8 The Engineering Report of 2014 described the Plumbing as unsatisfactory and in need of full reconstruction of its System, even stating that when the adjoining Cell flushes the toilet, the sewage of that cell will backflush into the other cell. (That's My Paraphrase and recollection, though the report even had the cost



of the repairs.

1.9 Ironically, in 2015, Due to the LandMark Case "Trueblood v. Washington State DSHS", DSHS did an inspection of some of its Major County Jails, Pierce County Being one of them, and The Conclusion of Pierce County Jails investigation by DSHS, "The Jail seems to be very Cold."

1.10 Either "DSHS Purposely Covered up the 2014 Engineering Report to Cover their butt, or Pierce County Purposely with-held that Report to DSHS..."

1.11 The Fact, Both Municipalities failed to Protect the Rights of it Most Vulnerable Citizens, "The Mentally ill."

1.12 In 2020, after being denied Grievances for several Months, and complaining to several officers (Captains, Lieutenants, Sgt's etc) about the unsanitary, inhumane conditions of Mental Health unit 30A, even being threatened that if I continued to talk about the issue, I would be Sanctioned, I began seeking help from DBW, Law Firms, Civil Rights Advocates, but to no avail.

1.13 Between 5-12-2020 and 12-15-2020, I was denied the Grievance Procedure, being told Pierce County was aware of the issue so it was not Grievable.

1.14 On 12-16-2020, I was able to speak with Plaintiff A. class certification PR

a Sgt. "Ake" outside the unit, on my way back from a Dental Call out, in which I was finally given a Grievance. I Filed an extensive Grievance, then I was lied about stating "I was satisfied," APPEaled, and never to see that Grievance heard, "Lost in Transport".

1.15 Paragraph 1.12 to 1.14 Can be read in its Entire Form under "Second Amended Complaint" Case # 21-CV-05068-JCC-SKV, with the Grievance attached in that Case.

1.16 On 1-25-21, I Filed My U.S.C. 1983 Complaint, which was delivered to Pierce County Council, Sheriff Ed Troyer, Chief of Correction Patti Jackson and other Deputy Correction officers of Different Banks, and each defendant being fully served, and once again being Put on notice about the Squalid Conditions of its Jail, Specifically, our Mental Health Unit 304A. (See Case # 21-CV-05068-JCC-SKV)

1.17 On 1-28-2021, an email was sent to Maintenance (Email was obtained through Discovery) in which they speak of an inmate (me) complaining of toilets back-flushing and Maintenance responds by saying that, "a report was done a few years back about the Plumbing, but Pierce County will not fund the Project". (Again My Memory, not exact word for word)

1.18 On March 16<sup>th</sup> 2021, I was Sent to the Department



of Corrections (Making injunctive Relief moot). On 11-27-2021 I was Released to Community Custody, and I had not <sup>been</sup> in 3 North A unit for over 2 years.

1.19 While in the Community, free from incarceration, I was given a Settlement offer for all Claims between 5-12-2020 to March 16<sup>th</sup> 2021 under Case # 3:21-cv-05068-JCC-SKV. (This was January 2023)

1.20 I Settled out of Court because it had been 2 years, I expected and actually believed that "Pierce County", its "Sheriff" and its "Chief of Correction", would have at least moved its most vulnerable citizens out of this disease infested unit.

1.21 Unfortunately, its May 2023, and Pierce County, The Sheriff, the Under-Sheriff and its Chief of Corrections have continued to deprive the Mentally Ill of their Constitutional Rights, by forcing us to live in inhumane conditions of Confinement. Not one thing in 3NA is Fixed.

... Please ...

1. Grant Class Certification
2. Grant immediate Injunctive Relief by forcing Pierce County, The Sheriff, Under-Sheriff and Chief of Correction to move our Mental Health Housing to a safer, hygienic location in the Jail until all Problems are Fixed.
3. Immediate APPT of Council



## Class Member Claims

1.1 We, Residence of 3NRA (Mental Health Housing unit) bring this Class Action 1983 Complaint for a deprivation of our:

1. 8<sup>th</sup> Amendment (Sentenced Members)

2. 14<sup>th</sup> Amendment (Detainee Members)

3. Washington State Constitution (All Members)

4. Ministerial Negligence (All Members)

5. 1<sup>st</sup> Amendment (Religious Members) (Government Grievance)

1.2 We as a Class bring Suit against:

1. Washington State Department of Social and Health Services - BCLW 10.77 Members

We bring suit against them in their "Official Capacity"

2. Pierce County Council

We bring Suit against them in their "Official Capacity"

Pierce County Council All Members

930 Tacoma Ave S. Floor 6

Tacoma, WA 98402

3. "Ed Troyer" Sheriff of Pierce County

We bring Suit against him in his Individual and Official Capacity. All Members

4. "Bomkamp" under-Sheriff of Pierce County

We bring suit against him in his Individual and official capacity. All Members

5. Patti Jackson "Chief of Corrections" (All Member)

Class Member PI

We Sue her in her Individual and official Capacity.

"Ed Troyer"

"Bomkamp"

Patti Jackson

Pierce County Sheriff Department

930 Tacoma Ave S.

Tacoma, WA 98402

### Claim 1

- 1.3 Our unit is Hazardous, Toxic, unhygienic and very dangerous to live in.
  - 1.4 Our toilets Constantly back-flush with each-others bodily waste; feces, urine, blood, throw-up etc. This happens every time the adjoining cell next to ours flushes the toilet, our whole unit. 10-15 times a day.
  - 1.5 If we don't catch or hear when the adjoining cell flushes, the bodily fluids of that person will bubble-up in our toilet, splashing the floor and walls and at times overflowing.
  - 1.6 We are denied cleaning supplies during these times and we resort to using our pink-jail T-shirts to clean it up, or toilet paper.
  - 1.7 At times, if we are going #2, and the adjoining cell flushes, his bodily waste will back-flush and splash onto my privates; butt, penis, balls etc.
  - 1.8 Every morning, around 4am, during breakfast, our toilets are filled with someone else's shit/feces, urine, raw sewage. Our cell's smell horrid, and
- Class Member: P.2



We are forced to eat our Breakfast in these Squalid Conditions. Many of us Cannot eat, or Puke up our breakfast.

- 1.9 When we ask the Cluster officers for Grievances, us individuals are told that, "its Past their Pay Raise to hand out Grievances to Criminals," "they no longer hand out Grievances," "its not Grievable because the County is already aware of the issue's"
- 1.10 The Fact is, Defendants are Clearly aware of the issue with our units Plumbing.
- 1.11 Our unit is a breeding ground for disease, and Defendants know this and have been deliberately indifferent to our health and Safety !!! Defendants Knew of and disregarded our health & Safety for years.
- 1.12 Two years ago, a 1983 Complaint was Filed under Case# 3:21-cv-05068-Jcc-SKV, the complaint was Served (Putting Pierce County and its Sheriff Department on Notice).
- 1.13 On March 10<sup>th</sup> 2022, The Honorable Magistrate Judge S. Kate Vaughan gave her Opinion. (See Davey v. Pierce Cnty. Council, 2022 U.S. Dist Lexis 125871)
- 1.14 During the Discovery Process of (Case # 3:21-cv-05068-Jcc-SKV) The above Case, a 2014 Engineering Report of Pierce County Jail was recovered, describing the unsatisfactory conditions of the units Plumbing System and



in need of Great Repair, even describing the Back-Flushing issue.

1.15 Also Recovered during Discovery in the above Case was an Email, dated 1-28-2021, 3 days after the above Case # 3:21-cv-05068-JCL-SKV was Filed. The email was between a Sgt. & Maintenance about 3NA Toilets. The Maintenance Man describes that a Report was Conducted a few years back, (describing the 2014 engineering report) but Pierce County has not Funded the Project, stating the cost to be \$250,000 or more.

1.16 You Cannot Put a Price tag on a human life, each individual Class Member has Suffered because of the Careless Acts of Pierce County, Washington State DSHS, The Sheriff, under-Sheriff, and Chief of Corrections.

## Claim 2

1.17 Our unit is Surrounded by 10 Sewage drain Pipes that Constantly leaves our unit with the Most Noxious odors that Causes damage to us, not being able to breathe Properly. Because of this Constant Odor, we are left with Migrain assaulting headaches, Vomiting, Diarrhea, and at times unable to eat. (See Davey v. Pierce Cnty Council et al March 10<sup>th</sup> 2022)

## Claim 3

1.18 Our unit Shower in 3rd Bath A is Covered in Rusted Paint on the Ceiling when First entering which Falls on our body. The vent itself has what we  
Class Members P.4

believe to be Black Mold falling out of it and onto our bodies when getting Dressed and undressed.

### Inductive Relief

1.19 We ask Specifically, that this Court Force Pierce County, its Sheriff, Under Sheriff, and Chief of Corrections to "Stop" housing it Most Vulnerable Citizens in squalid, unhygienic, toxic living Conditions and to Put a Permanent Indunction, forcing Defendants to Move us Citizens until the unit is Constitutionally acceptable to live in within 30 days of being served.

1.20 We also ask, Specifically, that this Court Force Washington State Department of Social and Health Services, to immediately admit to its Hospital, those Patients awaiting Restoration according to RCW 10.77, who are being forced to live in squalid toxic living Conditions because of Washington States refusal to Provide Transportation to its hospitals with 7 days of its Court order.

According to RCW 10.77, we are now Patients of the Department of Social and Health Services, and Authority and Care is now Transferred to Washington State DSHS, who continuously being held in Contempt, are now forcing their own Patients to exacerbated mental illness by Keeping us in unhealthy living Conditions. We are losing faith in our System.



1.21 We ask that this Court Force Pierce County to Move our Mental Health Level 3 Residence of 3NA to a unit Closer to our Mental Health Personnel, and Functional, Specifically 3E unit. The unit consist of 4 "15" Men dorms units A, B, C, D. Unit A of 3East is for Protected Custody or Most those Charged with a Sex offense. Units B, C and D house Regular General Population.

1.22 These units B, C, D consist of 15 beds each and would be better suited with the Mentally Ill, having being closer to MHP and it not a Normal Jail Setting better suiting those awaiting competency Restoration according to (Trueblood v. Washington State D.S.H.S.)

Relief

1.23 Because of Defendants failure to Cure, fix or abate our unit's known toxic conditions, Leaving us at a Substantial Risk of Transmitting a Disease, Continuous odors and our Showers, We Class Members Specific to the Case, ask in the Amount of \$ (Five Million) each for Punitive, Compensatory and Nominal Damages Under Penalty of Perjury

I believe and Testify that all thing herein is The Truth.

This 1<sup>st</sup> day of May 2023

Echofa Wolfclan

Wolfclan, E.



## Plaintiff

### 1. Plaintiff

Echota C. Wolfclan

BKG # 2023094005  
3 North A 30 Cell  
910 Tacoma Ave S

Tacoma, WA 98402

Signature  
Echota Wolfclan

... Class Members ...

### 1. Kristopher Starkgraf

BKG # 2023059007

3 North A 29 Cell

910 Tacoma Ave S.

Tacoma, WA 98402

Signature  
Kristopher Starkgraf

### 2. Carl Boyd Obenchain

BKG # 2023057006

3 North A 16-17 Cell

910 Tacoma Ave S.

Tacoma, WA 98402

Signature  
Carl B Obenchain

### 3. Chris Donapoli

BKG # 2023082007

3 North A 4-5 Cell

910 Tacoma Ave S

Tacoma, WA 98402

Signature  
Chris Donapoli

### 4. Troy Sevasin

BKG # 2022331019

3 North A 8-9 Cell

Signature  
Troy Sevasin

910 Tacoma Ave S.  
Tacoma, WA 98402

5. Elijah King  
BKG# 2029055017  
3 North A-24 Cell  
910 Tacoma Ave S  
Tacoma, WA 98402

Signature  
Elijah King

6. Ibrahim Abdalbarri  
BKG# 2022293015  
3 North A-1 Cell  
910 Tacoma Ave S  
Tacoma, WA 98402

Signature  
Ibrahim Abdalbarri

7. Adrian Johnson  
BKG# 2021302006  
3 North A-18 Cell  
910 Tacoma Ave S  
Tacoma, WA 98402

Signature  
Adrian Johnson

8. Justin Cutler  
BKG# 2022205019  
3 North A 10-11 Cell  
910 Tacoma Ave S.  
Tacoma, WA 98402

Signature  
Justin Cutler

9. Christian Stevens BKG# 2022315010

Signature  
Christian Stevens

9 North-A 6 Cell  
910 Tacoma Ave S  
Tacoma, Wa. 98402

10 Frank Hinkley  
BKG# 202304402  
3 North A-Cell 27  
910 Tacoma Ave S  
Tacoma, WA. 98402

Signature  
Frank Hinkley

11 Reid Wasankari  
BKG# 2020358017  
3 North A Cell 26  
910 Tacoma Ave S  
Tacoma, WA. 98402

Signature  
Reid Wasankari

12 Mark Erisman  
BKG# 2020278004  
3 North A Cell 25  
910 Tacoma Ave S  
Tacoma, WA. 98402

Signature  
Mark Erisman

13 Ian Flannery  
3NA28  
910 Tacoma Ave S  
TACOMA, WA 98402  
BKG# 2023061013

Signature  
Ian Flannery



See Attachment  
Permission for  
Certification Class

State with specificity the injury, harm, or damages you believe you suffered as a result of the events you described above in Count I. Continue to number your paragraphs.

Headaches, Stomach ache, Throwing up,  
irritability, dehumanized, unable to eat,  
immediate risk of disease. Sick.  
Exacerbated mental illness

**COUNT II**

*Identify the second right you believe was violated and by whom:*

2.1 1<sup>st</sup> Amendment Religious Freedom & Petition Government for grievance

*State the facts of your second claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.*

2.2

See  
Attachment

State with specificity the injury, harm, or damages you believe you suffered as a result of the events you described above in Count II. Continue to number your paragraphs.

A Total disconnect from my faith and a  
out right disobedience. I Prostrate myself  
on a unsanitary floor in a cell that constantly overflows  
with someone else's waste. While I pray Raw sewage  
seeps out toilet if adjoining cell flush's.

### COUNT III

Identify the third right you believe was violated and by whom:

3.1 Ministerial Negligence  
Washington State Due Process Clause

State the facts of your third claim below. Include all the facts you consider important. Be specific about dates, times, locations, and the names of the people involved. Describe exactly what each specific defendant did or failed to do that caused you injury or violated your rights, and include any other facts that show why you believe what happened was wrong. If you need additional space, you may attach extra sheets.

3.2

See  
Attached



State with specificity the injury, harm, or damages you believe you suffered as a result of the events you described above in Count III. Continue to number your paragraphs.

Headaches, vomit, diarrhea,  
Exacerbation mental illness,  
eminent Risk of disease.

## IV. RELIEF

State exactly what you want the Court to do for you. For example, you may be seeking money damages from an individual defendant, you may want the Court to order a defendant to do something or to stop doing something, or you may want both kinds of relief. Make no legal arguments. Cite no cases or statutes.

Punitive, Compensatory & Nominal Damages  
are being sought. Declaratory Relief &  
Immediate Injunctive Relief to Force  
The State's Patients and County inmates to  
be moved to safer living unit.

## V. SIGNATURE

By signing this complaint, you represent to the Court that you believe the facts alleged to be true to the best of your knowledge, that you believe those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

5-1-2023

Dated

Walden E

Plaintiff's Signature

Class Members Signatures

1. 5-1-23	KRISTOPHER STARKGRAF	Kristopher Starkgraf	3NA 29
2. 5-1-23	CARL O'BENCHIN	Carl O'Benchin	3NA-16-17
3. 5-1-23	Trey Sevashin	Trey Sevashin	3NA-8-9
4. 5-1-23	ADAM JOHN	Adam John	3NA-18
5. 5-1-4	CHRISTIAN LEE, STEVENS.	Christian Lee, Stevens.	3NA-6-7
6. 5-1-23	IBRAHIM ABDALBARI	Ibrahim Abdalbari	3NA-1
7. 5-1-23	Tellieun Harvey	Tellieun Harvey	3NA-20-21
8. 5-1-23	IAN FLANNERY	Ian Flannery	3NA-28
9. 5-1-23	FRANK MINCKLEY	Frank Minckley	3NA-27
10. 5-1-23	REID WASANKATI	Reid Wasankati	3NA-26
11. 5-1-23	MARK ERISMAN	Mark Erisman	3NA-25
12. 5-1-23	RAFAEL C SWENSEN	Rafael Swensen	3NA-22-23
13. 5-1-23	JOHN MACLEON	John MacLeon	3NA 6-7
14. 5-1-23	JUSTIN GUTLER	Justin Gutler	3NA 10-11
15. 5-1-23	ELIJAH G HIRM	Elijah G Hirm	3NA 24
16. 5-1-23	DANIELA DETWILER	Daniela Detwiler	3NA 2-3